

| UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY | |
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| GENOVA BURNS LLC Daniel M. Stoltz, Esq. Donald W. Clarke, Esq. Gregory S. Kinoian, Esq. dstoltz@genovaburns.com dclarke@genovaburns.com gkinoian@genovaburns.com 110 Allen Road, Suite 304 Basking Ridge, NJ 07920 Tel: (973) 467-2700 Fax: (973) 467-8126 <i>Proposed Local Counsel for the Official Committee of Talc Claimants</i> | BROWN RUDNICK LLP David J. Molton, Esq. Michael S. Winograd, Esq. Susan Sieger-Grimm, Esq. Kenneth J. Aulet, Esq. dmolton@brownrudnick.com mwinograd@brownrudnick.com ssieger-grimm@brownrudnick.com kaulet@brownrudnick.com Seven Times Square New York, NY 10036 Tel: (212) 209-4800 Fax: (212) 209-4801 And- Jeffrey L. Jonas, Esq. Sunni P. Beville, Esq. Eric R. Goodman, Esq. jjonas@brownrudnick.com sbeville@brownrudnick.com egoodman@brownrudnick.com One Financial Center Boston, MA 02111 Tel: (617) 856-8200 Fax: (617) 856-8201 <i>Proposed Co-Counsel for the Official Committee of Talc Claimants</i> |
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| In re: LTL MANAGEMENT, LLC, ¹ Debtor. | Chapter 11 Case No.: 23-12825 (MBK) Honorable Michael B. Kaplan Hearing Date: June 7, 2023, 10:00 a.m. |
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**NOTICE OF MOTION OF THE OFFICIAL COMMITTEE OF TALC CLAIMANTS
FOR ENTRY OF AN ORDER, PURSUANT TO BANKRUPTCY CODE SECTIONS
1103(c) AND 1109(b), GRANTING EXCLUSIVE LEAVE, STANDING, AND
AUTHORITY TO COMMENCE, PROSECUTE AND, IF APPROPRIATE, SETTLE
CERTAIN CAUSES OF ACTION ON BEHALF OF DEBTOR'S ESTATE**

PLEASE TAKE NOTICE, that on June 7, 2023 at 10:00 a.m., the undersigned, as local bankruptcy counsel for the Official Committee of Talc Claimants (the “Committee”) of LTL Management LLC, (“LTL” or the “Debtor”), shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, seeking the entry of the order submitted with this motion, and for such other relief that is just and proper.

PLEASE TAKE FURTHER NOTICE, that the undersigned shall rely upon the motion filed herewith in support of the relief sought.

PLEASE TAKE FURTHER NOTICE, that oral argument is requested.

PLEASE TAKE FURTHER NOTICE, that all objections must be in writing and filed at least seven days prior to the hearing date, with the Clerk of the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, and

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

a copy thereof must simultaneously be served upon GENOVA BURNS, LLC., Attn: Daniel M. Stoltz, Esq., 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920.

Respectfully submitted,

GENOVA BURNS, LLC

By: /s/ Daniel M. Stoltz

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*Local Counsel to the Official Committee
of Talc Claimants of LTL Management, LLC*